**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

HEADWATER RESEARCH LLC, *Plaintiff*, vs. SAMSUNG ELECTRONICS AMERICA, INC. and SAMSUNG ELECTRONICS CO., LTD., *Defendants*.	Case No. 2:22-cv-00422-JRG-RSP

UNOPPOSED MOTION FOR ENTRY OF SUPPLEMENTAL PROTECTIVE ORDER

Defendants Samsung Electronics America, Inc. and Samsung Electronics Co., Ltd. (collectively "Defendants") move for the Court to enter the Supplemental Protective Order attached as Exhibit A. The Court previously entered a Protective Order to protect Party and Non-Party confidential business information in the above-referenced action on April 5, 2023 (Dkt. No. 55) ("Protective Order").

Apple Inc. ("Apple" or "Non-Party"), a non-party to this action, may produce confidential source code, schematics, and other documents in this action that include or incorporate confidential business information ("CBI") belonging to Apple ("Apple CBI"). The Parties and Apple have agreed to provisions in addition to those contained in the Protective Order to protect against misuse or disclosure of such Apple CBI.

Therefore, Defendants respectfully request that the Court enter the Supplemental Protective Order attached as Exhibit A.

Dated: November 10, 2023   Respectfully submitted,

By: */s/ Jon Hyland*
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CERTIFICATE OF CONFERENCE

This is to certify that on November 9, 2023, counsel for Defendants conferred via email with counsel for Plaintiff regarding this motion. During the conference, counsel for Plaintiff stated that this motion was **unopposed**.

/s/ Jon Hyland
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CERTIFICATE OF SERVICE

This is to certify that all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system on this the 10th day of November, 2023.

/s/ Jon Hyland
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